Exhibit D to Application

Echols Testimony

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
Docket No. 2022-____-E
Docket No. 2022-____-E

In the Matter of:	)
Application of SR Lambert I, LLC for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 100 MW Solar Facility in Georgetown County, South Carolina Pursuant to S.C. Code Ann. § 58-33-10 et. seq., and Request to Proceed with Initial Construction Work, S.C. Code Ann. § 58-33-110(7).	)

In the Matter of:	)
Application of SR Lambert II, LLC for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 100 MW Solar Facility in Georgetown County, South Carolina Pursuant to S.C. Code Ann. § 58-33-10 et. seq., and Request to Proceed with Initial Construction Work, S.C. Code Ann. § 58-33-110(7).	)

PRE-FILED DIRECT TESTIMONY OF CONNOR ECHOLS ON BEHALF OF SR LAMBERT I, LLC AND LAMBERT II, LLC

March 2, 2022

Q. Please state your name, your position and your business address.

A. My name is Connor Echols. My business address is 222 2nd Avenue South, Suite 1900, Nashville, TN 37201. I am Senior Manager, Project Development, Silicon Ranch Corporation ("Silicon Ranch" or "SR"), and I am responsible for the initiation and development of the new the SR Lambert I, LLC ("Lambert I") and SR Lambert II, LLC ("Lambert II") solar projects (collectively, the "Projects") being planned and proposed for South Carolina. The Projects will operate on the S.C. Public Service Authority's ("Santee Cooper") system and sell power to both Santee Cooper and Central Electric Power Cooperative, Inc. ("Central").

Q. Please state your education, background, and professional affiliations?

A. I graduated from Gettysburg College with a degree in Environmental Studies and Vanderbilt University with a Master's in Business Administration. I have a certification in Lean Six Sigma.

Q. Please describe your business background and experience.

A. I joined Silicon Ranch in September of 2018 and have worked in and with various groups and departments covering operations, business development, project management, and construction in my almost four-year career with Silicon Ranch. I have been responsible for or involved in project development, project management and construction of a number of major projects since September 2018, including responsibility for the recent development, and construction of SR Snipesville II (107 MWac) in Jeff Davis County, GA and SR Lumpkin (100 MWac) Stewart County, GA. I assumed my current position in March, 2021. In addition to my work experience with Silicon Ranch, I have previously done consulting work for the Department of Defense.

Q. On whose behalf are you providing testimony today?

A. I am providing this testimony on behalf of Lambert I and Lambert II, as the applicants seeking approval of the Projects. As development lead for Silicon Ranch—the parent company of Lambert I and Lambert II—I am authorized and competent to give this testimony on behalf of both applicants. I am the Development Manager for both the Lambert I and Lambert II Projects.

Q. What is the purpose of your testimony in this Proceeding?

A. As the Commission knows, Lambert I and Lambert II are applying for Certificates of Environmental Compatibility Public Convenience and Necessity ("CECPCN") to each construct separate 100-megawatt AC ("MW") solar projects to be located in Georgetown County. The primary purpose of my testimony is to provide background and overview of the Lambert I and Lambert II projects and describe the planned operation of the solar projects being proposed. I will further describe the process for selecting the site to be acquired for the Projects. In addition, I will discuss the schedule for the Projects and provide the status of required permits and other regulatory reviews. Last, as applicable, I will explain or reiterate the strategic benefits, public convenience, and necessity of the Projects for South Carolina. I will also address the South Carolina Public Service Authority's ("Santee Cooper") and Central Electric Power Cooperative, Inc.'s ("Central") participation and role in the development and eventual utilization of the Projects.

Q. Please describe the company's personnel, technical experience, and financial capability to own and operate the Projects.

A. I have reviewed the testimony submitted by Matt Kisber covering these issues and completely agree with his description of Silicon Ranch's deep experience and strong

capacity to develop, own, and operate the Projects. As he explained, Silicon Ranch is a leading U.S. developer, owner, and operator of utility-scale solar projects, having more than 2.1 gigawatts of solar photovoltaic ("PV") systems being built or operated right now and another 2+ gigawatts in development. Silicon Ranch has successfully financed more than 1.5 billion worth of solar construction. In more than 10 years of business, Silicon Ranch has successfully executed every project for every PPA it has signed. SR has the demonstrated financial wherewithal, capacity, and backing to have the same success with the Lambert I and Lambert II Projects.

Silicon Ranch and its subsidiaries also own and operate their entire portfolio, which means that Silicon Ranch has a strong interest and track record in the continuous improvement and sustainability of all of its projects, including the proposed Lambert I and Lambert II Projects. Silicon Ranch has a deep bench of experienced professionals who control all facets of development and operation of large-scale solar PV projects just like the Lambert I and Lambert II Projects. Silicon Ranch's professional team also works closely with manufacturers, utilities, industry groups, and stakeholders to ensure the safety, performance, and cost efficiency of its projects, all of which contribute their operationality sustainability.

Q. Please generally describe the proposed locations for the Lambert I and Lambert II Projects.

A. Lambert I will be located on an approximately 785-acre parcel of land, and Lambert II will be located on approximately 1,290 acres of land adjacent to Lambert I. The Projects will be sited on privately-owned land in Georgetown County, South Carolina near the

unincorporated community of Lambert (the "Project Sites"). The color map at **Exhibit G,** incorporated by reference, accurately reflects the location of the proposed Projects. The property that makes up the Project Sites are currently used primarily for silviculture purposes. Control of the Project Sites has been secured through binding purchase options that Silicon Ranch has for the land comprising the Project Sites. These real property agreements afford the company the right to develop and use the property for solar energy purposes, including the installation of solar panels, inverters and the other elements of the Projects. The specific components to be used in the Projects are further set forth in **Exhibit G**, attached hereto and incorporated in my testimony.

The Projects Sites are adjacent to an electrical substation, and an existing 230 kV line owned by Santee Cooper which runs at or near the boundary lines for the property and parallel to US 17. Accordingly, the transmission infrastructure to support the Projects already exists at the proposed Project Sites.

Q. Please describe the process for evaluating and ultimately moving forward with the Project Sites.

A. Silicon Ranch undertook an initial Phase I Environmental Site Assessment and engaged HDR Engineering, Inc. ("HDR") to conduct a Critical Issues Analysis. These studies identified further issues for analysis but did not indicate any conditions which would adversely affect the Projects' ability to obtain all permits or approvals ultimately needed. In selecting the Projects Sites, Silicon Ranch also considered criteria such as land availability, cultural and land use, electric transmission infrastructure, water permitting,

and constructability. Based on those factors, it was determined that the Lambert-area locations were the best sites for moving forward with the proposed projects.

.Q. Please describe the basic components of the Projects.

A. Lambert I and Lambert II projects are each 100-MW PV arrays (totaling 200 MW of solar power capacity) and have solar energy as their sole source of power. The Projects will both be tracking, ground-mounted solar PV systems consisting of solar panels affixed to racks supported on driven piles. The Projects will also include inverters, a collection system, interconnection facilities, security systems, and other accessories. The system will be interconnected to the electric grid operated by Santee Cooper. Color maps showing the proposed boundaries of the Project Sites and layout with all major components, roads, fencing, and electrical systems for the Projects are included as **Exhibit G**, attached hereto and incorporated in my testimony.

Q. Please describe the transmission facilities to which the facility will interconnect and how the Projects will be

A collection substation will be constructed on the Facility Site to facilitate interconnection of the Facility to the grid operated by Santee Cooper. The collection substation will occupy an approximately 300 ft. x 400 ft. section of land adjacent to the Projects' switchyard and the Santee Cooper 230 kV transmission line. The collection substation will consist of circuit breakers, switching devices, and auxiliary equipment, and will be fenced and locked in accordance with industry standards to provide safety and security. A separate interconnection substation will be constructed and then owned and operated by Santee Cooper on land adjacent to the Project Sites. Installation of a short tie line will connect the Projects to the transmission system. The power that is generated will flow into the 230 kV

transmission line crossing the Projects Sites. A diagram of the interconnection facilities is at **Exhibit G** attached hereto and incorporated in my testimony.

Q. Please explain the need for the facility.

A. The separately submitted testimony of Kenneth Sercy covers and explains in great detail the need for the Projects. Based on my extensive involvement with every facet of the Projects and knowledge of the market for renewable power here in South Carolina and elsewhere, I wholly agree with Mr. Sercy's analysis.

First, it is important to recall the background that has directly led to Silicon Ranch proposing the Projects and the essential roles played here by Santee Cooper and Central Electric Power Cooperative, Inc. ("Central"). In its 2019 resource plan, Santee Cooper identified that it would add 1,000 MW of installed solar capability sourced from multiple projects, in diverse geographic locations, to be placed into service by 2024. Santee Cooper later updated its resource plans to also include an additional 500 MWac of solar capability to be added by 2031.

As explained by Santee Cooper, solar capability is included in its resource plans to provide energy to the system at a known price as a hedge against higher potential costs of fuel, carbon legislation, future renewable standards, or other regulatory changes aimed at reducing carbon or other emissions. Solar capability is also included as part of an overall strategy to reduce carbon and other emissions. Lastly, Santee Cooper's analysis found that a plan including 1,000 MW of new solar generation by 2024 would save consumers significantly. Central is a buyer of significant quantities of Santee Cooper-generated power.

In its 2020 resource plan and analysis, Central came to the same conclusion and recommended a plan for itself which would add 225 MW of solar to the Central system.

In May 2020, the South Carolina legislature further authorized Santee Cooper to procure up to 500 MW of solar power, doing so in coordination with Central.[1] In June 2020, Santee Cooper issued a request for proposals ("RFP") for solar energy with Central's participation. Proposals submitted for consideration were expected to have an installed capability in the range of 25 MW to 125 MW. Among the dozens of proposals, Silicon Ranch submitted the Lambert I and Lambert II Projects, which Santee Cooper selected for further development. Having been selected, Silicon Ranch will now develop, operate, and maintain the Projects and eventually sell the energy produced to Santee Cooper and Central pursuant to power purchase agreements ("PPA").

In sum, the need demonstrated, explained, and actually pursued by Santee Cooper and Central strongly supports the development of the Projects as proposed. More broadly, market conditions for renewable power are strong and support sustained off-take and demand for the power being produced by the Projects. Overall, demand for renewable energy is expected to increase over the lifetimes of the Projects. Moreover, load growth as a whole and, specifically, for those areas served by Santee Cooper and Central is expected to increase. Santee Cooper's and Central's commitments to add power in the form of solar

[1] The referenced legislation can be accessed at: https://www.scstatehouse.gov/sess123_2019-2020/bills/3411.htm

to their systems is evidence of the strong demand to support growing customer energy needs with clean, renewable solar power.

Q. Please explain the off-take plans.

A. As mentioned above, Santee Cooper and Central will enter into long-term PPAs with Santee Cooper and Central to purchase power from the Projects.

Q. Describe the permits and approvals you anticipate will be necessary to start construction of the Projects.

A. All required federal and state permits have been identified for the Projects as indicated in the permitting matrix attached hereto as **Exhibit H.** A wetland delineation for the Project Sites has been submitted to the US Army Corps of Engineers for its approval. Permits from the South Carolina Department of Health and Environmental Control seeking approval of construction activities and related stormwater and erosion prevention plans will also be obtained. Based on the detailed site due diligence and development studies for the Projects Sites performed to date, Silicon Ranch believes that there are no conditions which should adversely affect the Projects' ability to obtain all permits needed. Further and more detailed discussion of the foregoing permits and their statuses is separately provided by Ms. Blair Wade of HDR Engineering, Inc.

In addition to those permits identified in the matrix, Silicon Ranch is obtaining zoning compliance and site plan approval from Georgetown County. Silicon Ranch, based on the preliminary plans for the Projects, has further consulted with Georgetown County concerning building permits and expects no difficulties in obtaining final permits to begin

construction. Before beginning any work, Silicon Ranch will have final building permits as required.

Q. Based on the current plans, when could the Projects be ready for commercial operation?

A. Per the RFP, projects are expected to deliver power not later than January 1, 2024. However, subject to the Commission's approval, both Lambert I and Lambert II could reach commercial operation by the second quarter of 2024. To achieve or exceed that estimate, Silicon Ranch requests permission from the Commission to begin initial construction work as soon as possible, even if before a final CECPN might be approved.

Q. Please describe the anticipated benefits of the Projects to the Community.

A. The Facility represents an investment of tens of millions of dollars into the Georgetown County community. Lambert I and Lambert II anticipate that the county will realize significant property and real estate tax revenues annually from the Projects. Aside from immediate fiscal benefits, the Projects will enhance the County's reputation as an attractive, forward-thinking, and friendly environment for additional investments in advance manufacturing, technology, renewable energy and related fields. Local contractors and businesses engaged in installation, construction, fencing, landscaping, and machine rentals will receive sales opportunities during the Projects' construction and post-construction operation. During the approximately year and a half-long construction process, construction work will be needed at the Project Sites, and Lambert I and Lambert II anticipate hiring numerous workers including from the surrounding areas. This increased economic activity in the area is expected to increase revenue for local hotels, restaurants, service stores, and other vendors.

Q. What are the overall environmental impacts expected from the Projects?

A. By design and its nature as solar PV facilities, the Projects will provide clean renewable power with minimal environmental impacts. The Projects will create no air or water emissions and no environmental contamination. There will be no noise impacts or little or no impact as it relates to the rural feel of the area. At the end of the Projects' useful life, materials can be recycled or sold for scrap. Because of Silicon Ranch's leading land management practices, the land can be returned to agricultural uses once the useful lives of the Projects are reached. Further and more detailed discussion of environmental impacts is separately provided by Ms. Wade in her written testimony.

Q. What are the long-term plans for ownership of the Projects?

A. Currently, Lambert I and Lambert II are expected to each own 100% of the respective Projects. As discussed above, Lambert I and Lambert II will sell power to Santee Cooper and Central.

Q. Does Public Convenience and Necessity justify construction of the Lambert I and Lambert II projects?

A. Yes. As discussed above, Santee Cooper has adopted a preferred resource plan for meeting growing energy needs that improves operating efficiency, reduces environmental impacts, and results in lower overall cost. Pursuant to those goals, Santee Cooper sought proposals and, from among dozens, selected to work with Silicon Ranch and to purchase power from the proposed Lambert I and Lambert II projects. The Projects will provide clean renewable power with minimal impacts to the environment. As described by Santee Cooper and Central in their IRPs and in the solar RFP, the best option for meeting its objectives is the

addition of PV solar. The Lambert I and Lambert II Projects are a key part of implementing Santee Cooper's IRP and providing cost-effective clean energy to consumers.

Q. Will you update your testimony based on information that becomes available?

A. Yes. I will revise and add to my testimony on behalf of Lambert I and Lambert II via supplemental or amended testimony if new information becomes available or known.

Q. Does this conclude your testimony?

A. Yes. Thank you for the opportunity to provide my sworn testimony in this important matter, and I am further glad to provide additional live testimony if needed.